National Organic Standards Board United States Department of Agriculture (USDA) AMS - Room 3071, South Agriculture Building 1400 Independence Avenue SW Washington DC 20250 RECEIVED USDA MATIONAL ORGANIC PROGRAM

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I am writing because I am deeply concerned and appalled that so-called "organic" factory-farm feedlot dairies are importing milk calves from conventional farms and then raising these animals in crowded, inhumane conditions, with no little or access to pasture, and then labeling the milk and dairy products produced on these feedlots as "USDA Organic."

A number of large farms are producing milk on Concentrated Animal Feeding Operations (CAFOs), allowing their animals only token access to pasture.

Even though the organic regulations (§205.239) require producers to "maintain livestock living conditions which accommodate the health and natural behavior of animals, including...access to pasture for ruminants" these corporate farm operators are gaming the system and putting family-scale farmers at a serious competitive disadvantage.

It is imperative that the National Organic Program of the USDA to put an end to these misleading "organic" practices immediately.

It is also imperative that the USDA call on Congress to allocate adequate funds to help thousands of American farmers and ranchers make the transition to organic, so we can meet the nation's growing demand for organic foods, without lowering organic standards, or importing billions of dollars in organic products unnecessarily from overseas.

Thank you for your help in this very urgent matter.

Respectfully,

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